

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

WILLIE C. ALEXANDER and
BELINDA N. PITMAN,

Plaintiffs,

V.

CERTEGY CHECK SERVICES, INC.,

Defendant.

Case No.: 2:05-cv-0449-WKW

MOTION FOR LEAVE TO AMEND COMPLAINT

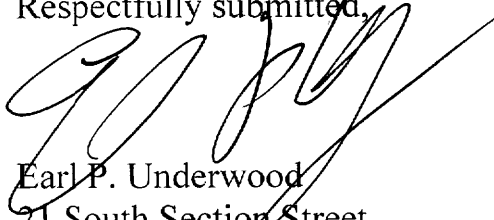
COME NOW the Plaintiffs pursuant to Rule 15 of the Federal Rules of Civil Procedure and move for entry of an order allowing them to file the attached amended complaint. As grounds therefore, Plaintiffs state:

1. Rule 15 requires that leave to amend should be freely given when justice requires. The provisions of the Rule are to be liberally construed.
2. The Defendant will not be prejudiced by allowing the amendment.
3. The amendment will not result in any undue delay in the litigation of this case. The parties are in the initial stages of discovery, and sufficient time remains before the discovery cut-off to address any new issues raised by the amendment.

4. The Plaintiff seek to amend their complaint to add additional, related counts under the Fair Credit Reporting Act, specifically, 15 U.S.C. § 1681m.

WHEREFORE, the Plaintiffs pray this Court will enter an Order permitting them to file the attached amended complaint.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of May, 2006, he served a copy of the foregoing by first class mail and electronic mail, on the following persons:

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